

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13 CASE NO.:**

**DAVID H. VINCENT**

**16-13281-JDW**

**TRUSTEE'S LIMITED OBJECTION TO MOTION TO SELL REAL PROPERTY**

COMES NOW the Chapter 13 Trustee, Locke D. Barkley (the "Trustee") by and through counsel, and files this Limited Objection to the Debtor's Motion to Sell Real Property (Dkt. #60) (the "Motion"); and in support thereof states as follows:

The Trustee does not object to the sale of the real property; however, the Trustee submits that in the event the proceeds from the sale exceed the \$75,000.00 homestead exemption, any proceeds over \$75,000.00 must be disbursed to the Trustee within two (2) days of closing. Further, the Trustee should be provided a copy of the HUD-1 Settlement Statement within two (2) business days of closing.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Limited Objection be received and filed and upon a hearing hereon, this Court will enter its order granting the Motion subject to the limitations above. The Trustee also requests such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: September 3, 2019.

Respectfully submitted,

**LOCKE D. BARKLEY**  
**CHAPTER 13 TRUSTEE**

By: /s/ Melanie T. Vardaman  
ATTORNEYS FOR TRUSTEE  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: September 3, 2019.

/s/ Melanie T. Vardaman  
MELANIE T. VARDAMAN